

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

SCOTT STERLING, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

IRIS ENERGY LIMITED, DANIEL
ROBERTS, WILLIAM ROBERTS, DAVID
BARTHOLOMEW, CHRISTOPHER
GUZOWSKI, MICHAEL ALFRED,
J.P. MORGAN SECURITIES LLC,
CANACCORD GENUITY LLC,
CITIGROUP GLOBAL MARKETS INC.,
CANTOR FITZGERALD & CO.,
GALAXY DIGITAL PARTNERS LLC,
COMPASS POINT RESEARCH &
TRADING, LLC, and MACQUARIE
CAPITAL (USA) INC.,

Defendants.

: Case No. 1:22-cv-7273-JMV-

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: STIPULATION AND
: ORDER FOR
: UNDERWRITER
: DEFENDANTS TO MOVE OR
: OTHERWISE RESPOND TO
: FIRST AMENDED
: COMPLAINT

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WHEREAS, on March 27, 2023, following the submission of motions for the appointment of Lead Plaintiff, the Court appointed (i) Network Racing Pty Ltd., Nahi Beaini, LRJ, Superannuation Fund, and De Stoop Investments Pty Ltd. as Lead Plaintiffs, (ii) Bottini & Bottini, Inc. as Lead Counsel for the putative class, and (iii) Cohn Lifland Pearlman Herrmann & Knopf LLP as Liaison Counsel (ECF No. 34);

WHEREAS, pursuant to the schedule set forth in a stipulation and Order dated April 20, 2023 (ECF No. 36), Lead Plaintiffs filed a First Amended Complaint on June 6, 2023 (ECF No. 38);

WHEREAS, the First Amended Complaint added as Defendants J.P. Morgan Securities LLC, Canaccord Genuity LLC, Citigroup Global Markets Inc., Cantor Fitzgerald & Co., Galaxy Digital Partners LLC, Compass Point Research & Trading, LLC, and Macquarie Capital (USA) Inc. (collectively, the “Underwriter Defendants”);

WHEREAS, Defendants Iris Energy Limited, Daniel Roberts, William Roberts, David Bartholomew, Christopher Guzowski, and Michael Alfred previously agreed to move or otherwise respond with respect to the First Amended Complaint by August 4, 2023 (ECF No. 36);

WHEREAS, the Parties have conferred and are in agreement on a schedule for the filing of the Underwriter Defendants’ response to the First Amended Complaint.

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned attorneys for the Parties, as follows:

1. The Underwriter Defendants' deadline to move to dismiss, answer, or otherwise respond to the First Amended Complaint is August 4, 2023.
2. If the Underwriter Defendants move to dismiss the First Amended Complaint, Lead Plaintiffs shall file their opposition thereto by October 4, 2023, and the Underwriter Defendants shall file any reply in further support of their motion to dismiss by November 17, 2023.
3. The Underwriter Defendants expressly reserve all rights, defenses, or other objections, except as to service of the summons and First Amended Complaint.
4. Nothing in this stipulation and Order shall prejudice the right of any Party to seek further extensions on the consent of the other Parties or from the Court.

Respectfully submitted this 4th day of August 2023, by:

Dated: August 4, 2023

SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP
SCOTT D. MUSOFF

/s/ Scott D. Musoff

Scott D. Musoff
William J. O'Brien
(*pro hac vice* forthcoming)
One Manhattan West
New York, New York 10001
Telephone: (212) 735-3000
Fax: (212) 735-2000
(scott.musoff@skadden.com)

*Attorneys for Defendants J.P. Morgan
Securities LLC, Canaccord Genuity
LLC, Citigroup Global Markets Inc.,
Cantor Fitzgerald & Co., Galaxy
Digital Partners LLC, Compass Point
Research & Trading, LLC and
Macquarie Capital (USA) Inc.*

Dated: August 4, 2023

GIBBONS P.C.
SAMUEL I. PORTNOY

/s/ Samuel I. Portnoy

Samuel I. Portnoy
Christina M. LaBruno
One Gateway Center
Newark, New Jersey 07102
Telephone: (973) 596-4500
sportnoy@gibbonslaw.com
clabruno@gibbonslaw.com

DAVIS POLK & WARDWELL LLP
Edmund Polubinski III
Mari G. Byrne
450 Lexington Avenue
New York, New York 10017
Telephone: 212-450-4000
edmund.polubinski@davispolk.com
mari.byrne@davispolk.com

Attorneys for Defendants Iris Energy Limited, Daniel Roberts, William Roberts, David Bartholomew, Christopher Guzowski, and Michael Alfred

Dated: August 4, 2023

COHN LIFLAND PEARLMAN
HERRMANN & KNOPF LLP
PETER S. PEARLMAN

/s/ Peter S. Pearlman

Peter S. Pearlman
Matthew F. Gately
Park 80 Plaza West-One
250 Pehle Avenue, Suite 401
Saddle Brook, New Jersey 07663
Telephone: (201) 845-9600

BOTTINI & BOTTINI, INC.
Francis A. Bottini, Jr.
(*pro hac vice* forthcoming)
Albert Y. Chang
(*pro hac vice* forthcoming)
7817 Ivanhoe Avenue, Suite 102
La Jolla, California 92037
Telephone: (858) 914-2001
Facsimile: (858) 914-2002
Email: fbottini@bottinilaw.com

achang@bottinilaw.com

Attorneys for Lead Plaintiffs

IT IS SO ORDERED.

DATED: 8/7/23


Hon. Michael A. Hammer